## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

AUTONOMOUS DEVICES, LLC,	)
Plaintiff,	)
v.	) C.A. No. 22-1466 (MN)
TESLA, INC.,	)
Defendant.	)

## MOTION FOR TELECONFERENCE TO RESOLVE PROTECTIVE ORDER DISPUTES

Defendant Tesla, Inc. ("Defendant") respectfully moves this Court to schedule a teleconference to address the following issue:

• Protective order disputes regarding source code protection provisions.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer by telephone on the following date(s):

First Meet and Confer: April 26, 2023 Second Meet and Confer: May 1, 2020

Delaware Counsel for Plaintiff: Karen E. Keller Delaware Counsel for Defendant: Brian P. Egan Lead Counsel for Plaintiff: Blair M. Jacobs Lead Counsel for Defendant: Jan A. Moore

The parties are available for a teleconference on the following dates: May 18, May 21, or May 31, 2023.

/s/ Brian P. Egan

OF COUNSEL:

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May 5, 2023

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Attorneys for Defendant Tesla, Inc.

United States District Judge

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_\_, 2023.

## **CERTIFICATE OF SERVICE**

I hereby certify that on May 5, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on May 5, 2023, upon the following in the manner indicated:

Karen E. Keller, Esquire Emily S. DiBenedetto, Esquire SHAW KELLER LLP I.M. Pei Building 1105 North Market Street, 12th Floor Wilmington, DE 19801 Attorneys for Plaintiff

VIA ELECTRONIC MAIL

Blair Jacobs, Esquire Christina A. Ondrick, Esquire John S. Holley, Esquire McKool Smith, P.C. 1999 K Street, NW Suite 600 Washington, D.C. 20006 Attorneys for Plaintiff

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George T. Fishback, Jr., Esquire McKool Smith, P.C. 303 Colorado Street, Suite 2100 Austin, TX 78701 Attorneys for Plaintiff

VIA ELECTRONIC MAIL

/s/Brian P. Egan

Brian P. Egan (#6227)